

SEABRIDGE GOLD

September 18, 2019

Mackenzie Valley Land and Water Board
4922, 48th Street, 7th Floor
P.O. Box 2130
Yellowknife, NWT X1A 2P6



Received: September 18, 2019

File #: MV2019C0025

Copied to: TM / Registry

Attention: Ms. Tyree Mullaney, Regulatory Specialist

Dear Ms. Mullaney:

Re: Final Plan - Type A Land Use Permit MV2012C0025

Seabridge Gold Inc. (Seabridge) is a Canadian based resource exploration company, registered to do business in NWT as Seabridge Gold (NWT) Inc. Seabridge has been conducting gold exploration in the Courageous Lake area since 2003 and for the past seven years, these exploration activities have been regulated by Class A Land Use Permit (MV2012C0025) issued by the Mackenzie Valley Land and Water Board (MVLWB). This permit expires December 27, 2019.

For the next five to seven years, Seabridge proposes to continue to conduct the same exploration activities with a focus on growing the mineral resources, maintaining community relationships and expanding the geological, ecological and traditional knowledge of the area. To authorize the proposed exploration activities Seabridge is submitting one Class A land use permit application and two Type B water licence applications, herewith.

The complete application package consists of this cover letter, three application forms, an Exploration Work Plan that describes the proposed explorations activities, five management plans, GIS shapefiles and fees. Once approved by the MVLWB the management plans will prescribe the methods and mitigations that Seabridge will follow during the term of the permit and licences. A complete application package has been sent to you electronically today. Payment of fees, as itemized below were delivered to your office on September 13, 2019. One complete paper copy of the application package has been couriered separately and should arrive on/about September 20, 2019.

The Courageous Lake property is located approximately 240 km northeast of Yellowknife on lands within the Treaty 11 Claim, the Akaitcho Traditional Territory, the Wek'eezhii Resource Management Area and the Monwhi Gogha De Nittae Areas of the Tlicho Land Claim Agreement as well as the North Slave Métis traditional lands. Traditional lands of the NWT Métis Nation lie to the east of the property. As a result the land use permit and water licence applications should be considered transboundary applications pursuant to s. 103(1)(a) of the *Mackenzie Valley Resource Management Act* (MVRMA).

The property encompasses lands that are under the administration of the Government of NWT (GNWT) and the Minister of Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). The existence of this split estate requires separate applications to use water on Territorial land and to use water on Federal land pursuant to the Northwest Territories Waters Regulations and the Mackenzie Valley Federal Areas Waters Regulations, respectively. In contrast, the Mackenzie Valley Land Use Regulations enable the MVLWB to issue a single land use permit for all lands within the Mackenzie Valley. Throughout all supporting documents Seabridge has distinguished activities and use of Federal lands and Territorial lands.

Proposed Scope of Work:

As stated previously, Seabridge proposes to conduct the same exploration activities as previously permitted under Class A permit MV2012C0025. The scope of work as defined in the expiring permit is:

- Mineral exploration including diamond drilling;
- Fuel storage;
- Winter road construction/maintenance; and
- Quarrying.

The scope of work will remain unchanged for the next five to seven year term. All proposed exploration activities will continue to occur within the same permit boundary as the expiring permit, defined by 63°50' N and 111°00' W by 64°20' N and 111°30' W.

Seabridge proposes to continue to use water for drilling, winter road construction, and potable uses. No additional or alternative water uses are being proposed. Seabridge's application for a water licence is necessitated only by a desire to increase its daily water use from the 100 m³/day (allowed without a license) to 299 m³/day (the upper limit for a Type B licence for a miscellaneous undertaking). The additional water will provide Seabridge with greater logistical flexibility to operate up to five drills simultaneously.

The increased water use is the only change to Seabridge's exploration activities. The terms and scope of the land use permit will remain the same. The fuel storage and equipment required to support exploration drilling were described as part of the previous land use permit. This application describes the possible additional fuel storage and equipment that may be required to support up to five drills. There is no change to the scope required, only total volume and number of equipment.

Seabridge does not propose to conduct any advanced exploration activities such as: bulk sampling or mining that result in the deposit of wastes.

Preliminary Screening:

The MVLWB completed a preliminary screening report on December 28, 2012 for permit MV2012C0025 in accordance with s. 125 of the MVRMA. The screening report is attached for your reference.

Seabridge proposes that the attached land use permit renewal application should be exempt from further screening since the application is a renewal of an existing permit with no change in scope or activities.

While the proposed uses of water remain the same as the previous permit term, the applications for two water licences are new and reflect a desire to increase the previously authorized volume of 100 m³ per day to a maximum of 299 m³ per day. Thus, Seabridge proposes that only the incremental volume from 100 to 299 m³/day should be subject to preliminary screening.

To support the water licence applications, Seabridge undertook a desktop study to identify water bodies that can support the proposed water withdrawal without resulting in serious harm to fish or fish habitat as a result of the water use.

Staged Security:

Seabridge proposes a two-stage approach to security that corresponds with the two phases of drill programs that are envisioned during the term of the applications and described in section 5.2 of the Exploration Work Plan. Seabridge has prepared two financial security estimates that align with the activities and equipment requirements for each phase.

The estimated security to be posted by Seabridge for Phase 1 is \$45,011 and prior to beginning work in Phase 2 an additional amount of \$68,477 should be posted to bring the total amount of security to \$113,488. The details of the both security calculations, including assumptions are provided in the Closure and Reclamation Plan.

Seabridge met with representatives of GNWT and CIRNAC to discuss the calculation methodology, assumptions and distribution of the security. Since the exploration work will be undertaken primarily on land, with little or no risk to water resources, Seabridge proposes to apply 100% of the security to land, under the land use permit. The allocation between Territorial and Federal land is based on the location of the activities. All infrastructure is located on Territorial land and it is estimated that 75% of the proposed drill holes will be located on Territorial land, and 25% will be on Federal land. Thus the bulk of the security estimate is allocated to Territorial land.

The GNWT and CIRNAC Inspectors support the allocation of 100% of the security to the land use permit, the allocation of security between Territorial and Federal land and the appropriateness of the MVLWB Land Use Permit Worksheet as a method to calculate security. There was agreement among all others that any further discussion regarding security, if necessary, could be addressed during the public review phase.

Final Plan for Permit MV2012C0025:

Seabridge previously posted financial security in the amount of \$45,000 pursuant to permit MV2012C0025. Seabridge is submitting a Final Plan under separate cover that summarizes the reclamation completed under the permit and the calculation of land use fees that are payable. Seabridge expects that the Final Plan will be reviewed and approved, and requests that the existing security be transferred to the new/renewed land use permit.

Pre-submission Engagement:

Seabridge is committed to actively engaging and developing positive and lasting relationships with local Indigenous Groups. Prior to submitting this application package, Seabridge undertook pre-submission engagement activities commencing June 27, 2018. During the ensuing fourteen months, Seabridge had many opportunities to engage with potentially affected parties, including meetings with staff of Indigenous Groups, meetings with Chiefs and Council or leadership, Community meetings, phone calls, letters, e-mails, press releases, technical reports, posters and presentations. The objectives of these activities were to:

- Explain the time frame for permitting activities and the scope of the proposed exploration programs,
- Share information about the Courageous Lake project and work completed to date,
- Develop positive working relationships with affected parties to support ongoing engagement,
- Understand the affected parties, their interests and concerns, and
- Consider and, where possible, accommodate suggestions made by affected parties in the development of content of supporting documents.

A summary of the pre-submission engagement activities, concerns raised and Seabridge's response is provided in section 10 of the Exploration Work Plan. A detailed log is provided in Appendix H of the Work Plan.

As outlined in the attached Engagement Plan, Seabridge will continue to engage with potentially affected parties to provide regular updates on our activities.

Application and Usage Fees:

As requested by MVLWB, Seabridge has prepared six cheques, representing application and usage fees as described in the following table: The cheques were delivered to MVLWB under separate cover.

	Payee	Amount	Purpose / Particulars
1	Receiver General for Canada	\$30.00	Type B Water Licence application fee – Federal Land
2	Receiver General for Canada	\$272.84	Water use fees for first year – Federal land (assumes 25% of authorized limit of 299 m3/day for full year)
3	Receiver General for Canada	\$30.00	Type B Water Licence application fee – Territorial Land
4	Government of NWT	\$818.51	Water use fees for first year – Territorial land (assumes 75% of authorized limit of 299m3/day for full year)
5	Receiver General for Canada	\$150.00	Class A Land Use Permit application fee – Federal & Territorial land
6	Receiver General for Canada	\$310.00	Land use fees for Federal land (assumes 8.2 ha total federal land use, less 2 ha included in application fee).

Seabridge has attached application checklists and conformity tables to assist with the completeness and regulatory review of this application package.

Should you have any questions, please do not hesitate to contact Jane Howe at jane@seabridgegold.net or 306-321-4144.

Yours truly,



R. Brent Murphy, M.Sc., P.Geo.
Vice President, Environmental Affairs

List of attachments:

1. Class A Land Use Permit Application – Territorial and Federal lands
2. Type B Water Licence Application – Territorial land
3. Type B Water Licence Application – Federal land
- 4a. Checklist and Conformity Table (Land Use Application)
- 4b. Checklist and Conformity Table (Water Licence Applications)
5. Preliminary Screening report for MV2012C0025, dated December 28, 2012
6. Exploration Work Plan, including pre-submission engagement log
7. Engagement Plan
8. Wildlife Management and Monitoring Plan, including WMMP questionnaire
9. Waste Management Plan
10. Spill Contingency Plan
11. Reclamation and Closure Plan, including security estimates
12. GIS Shapefiles (attached to e-submission only)

Sent under separate cover:

- Six cheques for application fees and prepaid land use and water use fees
- One complete printed set of attachments 1 through 11.

Mackenzie Valley Land and Water Board



LAND USE PERMIT APPLICATION FORM

Subsection 19(2) and Schedule 2 of the [Mackenzie Valley Land Use Regulations](#)

Use an "x" to indicate which Board the Application is being made to:	Mackenzie Valley Land and Water Board:	X	Sahtu Land and Water Board:	
	Wek'èezhì Land and Water Board:		Gwich'in Land and Water Board:	

To complete this Form, please refer to the MVLWB [Guide to the Land Use Permitting Process](#) (Guide) and fill in the grey fields; attach additional pages if necessary. Please review the following guidance for formatting your Application Package:

- [Document Submission Standards](#)
- [Standard Outline for Management Plans](#)

If applicable, reference the existing or current Land Use Permit file number:	MV2012C0025		
Use an "x" to indicate if this Application is accompanied by an Application for a Water Licence:	Water Licence – in a non-federal area:		X
	Water Licence – in a federal area:		X

1. NAME AND CONTACT INFORMATION – APPLICANT

Applicant's Name:	R. Brent Murphy		
Position:	V.P. Environmental Affairs		
Mailing Address:	106 Front Street East, Suite 400		
Community:	Toronto	Telephone:	720-473-0630
Prov/Terr:	ON	Email:	brent@seabridgegold.net
Postal Code:	M5A 1E1	Other:	jane@seabridgegold.net

2. NAME AND CONTACT INFORMATION – APPLICANT'S HEAD OFFICE

Please include a Certificate of Corporate Registration from the Government of the Northwest Territories in your Application Package.

Name:	Seabridge Gold (NWT) Inc.		
Mailing Address:	106 Front Street East, Suite 400		
Community:	Toronto		
Prov/Terr:	ON	Telephone:	720-473-0630
Postal Code:	M5A 1E1	Email:	brent@seabridgegold.net
Field Supervisor:	Marcus Allen	Other:	marcus@seabridgegold.net

3. NAME AND CONTACT INFORMATION – CONTRACTORS AND SUB-CONTRACTORS

Please include relevant names, responsibilities, and contact information. An additional table should be added for each contractor and subcontractor.

Name:	Refer to section 5.9 of the attached Exploration Work Plan		
Company Name:			
Mailing Address:			
Community:		Telephone:	
Prov/Terr:		Email:	
Postal Code:		Other:	

4. LOCATION OF ACTIVITIES

Maps and Geographic Information System (GIS) Data: Attach a map to your Application Package indicating the locations of proposed activities, including waste deposits, watercourses, and water sources. Provide latitude and longitude geographic coordinates of project features, and the maximum and minimum project boundary in degrees, minutes, seconds, or decimal degrees. Attach GIS data to your Application Package, if applicable. Refer to the MVLWB [Guideline for Geographic Information Systems \(GIS\) Submission Standard](#) for providing geographic information.

Minimum latitude:	63°50' N	Maximum latitude:	64°20' N
Minimum longitude:	111°00' W	Maximum longitude:	111°30'W

NTS Map Sheet No.: Provide the map sheet number:

75M/14, 76D/03, 76D/06

Land Types: Use an “x” to indicate the type(s) of the land on which the activities are proposed.

Free Hold/ Private:		Commissioner’s/ Territorial Lands:	X	Federal Land:	X	Municipal Land:	
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5. ELIGIBILITY

Please refer to section 18 of the [Mackenzie Valley Land Use Regulations](#). Use an “x” to indicate which one applies.

18(a)(i):	X	18(a)(ii):		18(a)(iii):		18(b):	
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6. RIGHTS AND/OR CONTRACTS TO SUPPORT ELIGIBILITY

Please contact federal, territorial, and Aboriginal governments, and other parties to ensure all appropriate rights, authorizations, permissions, dispositions, and contracts have been obtained or are in the process of being obtained (e.g. mineral exploration rights, quarry permits, licences of occupation, leases, access agreements and authorizations, etc.). List and provide confirmation of other authorizations that relate to your activities; include these to your Application Package (e.g. rights, permits, licences, etc.).

Seabridge Gold (NWT) Inc. wholly owns 79 mining leases, 10 mineral claims, and has rights to Surface Lease 76D/03-6-6 and Quarrying Permit 2019QP0036. Refer to the attached Exploration Work Plan, Sections 2.3 and 2.4 and Appendices B and G for details.

7. PERMIT TYPE AND CRITERIA

Please refer to sections 4 and 5 of the [Mackenzie Valley Land Use Regulations](#). Use an “x” to indicate which permitting criteria apply:

Type A				Type B				Type C	
4(a)(i):		4(b)(i):	X	5(a)(i):		5(b)(i):		(SLWB and WLWB only):	
4(a)(ii):	X	4(b)(ii):		5(a)(ii):		5(b)(ii):			
4(a)(iii):	X	4(b)(iii):	X	5(a)(iii):					
4(a)(iv):	X	4(b)(iv):		5(a)(iv):					
4(a)(v):	X			5(a)(v):					
				5(a)(vi):					

8. PROJECT DESCRIPTION

Please include your project description in your Application Package, or for small-scale projects, describe your proposed activities in the grey field provided below. Include the elements identified in subsection 19(3) of the [Mackenzie Valley Land Use Regulations](#), the name and type (e.g., lake, river) of water source(s), and the purpose and quantity of water to be used (rates, volumes (m³/day)). Indicate the total number of hectares to be used in each phase of the project, as well as through the life of the project.

The proposed multi-year mineral exploration program is fully described in the accompanying Exploration Work Plan. Activities include exploration drilling, fuel storage, winter road construction/maintenance and use, and quarrying (sand and gravel). Seabridge will use the existing Tundra/Salmita airstrip and existing local gravel roads. These activities are consistent with the activities permitted in MV2012C0025.

Please refer to the attached Exploration Work Plan for the details of the proposed exploration activities.

9. CAMP

Please describe the proposed camp size and layout. Indicate the number of person-days; explain, with rationale, any variations in the number of people that may be on site over the life of the project.

No camp. Seabridge will continue to undertake exploration activities from the Matthews Lake camp which is operated under surface lease 76D/03-6-6.

10. ROADS AND ACCESSES

Please include detailed information about the construction, location, and decommissioning of any roads and accesses.

Use an “x” to indicate if this is to be a pioneered road or access.	Yes		Use an “x” to indicate if the route has been laid out or ground-truthed.	Yes	X
	No	X		No	

The winter road route has been used since the 1950s. Existing gravel roads were constructed in 1960s through 1980s. Roads will be maintained but will not be altered/changed.

11. WASTE MANAGEMENT METHODS

Please use the grey fields below to provide or reference the following information:

Waste Management Plan: Include your Waste Management Plan in your Application Package, if applicable, or for small-scale projects, describe the proposed waste management activities in the grey fields provided below. A template for the Plan can be found in the MVLWB [Guidelines for Developing a Waste Management Plan](#).

Waste Type	Management Method(s)
Garbage:	See attached Waste Management Plan
Sewage (Sanitary and greywater):	See attached Waste Management Plan
Brush and trees:	n/a
Overburden (Organic soils, waste material, etc.):	n/a

Off-site Disposal: If waste is proposed to be disposed of off-site within the NWT, written confirmation (e.g., an email, letter, etc.) from the facility/facilities indicating they will accept the waste is required. Include it/these in your Application Package.

Refer to Appendix D of the attached Waste Management Plan

12. EQUIPMENT

Please identify the types of equipment proposed to be used.

Number	Type/Description	Size (weight in tonnes)	Proposed use
	Refer to section 5.6 of the Exploration Work Plan for an equipment list		

13. FUEL

Please identify all fuel types proposed to be used.

Type of Fuel	Number of containers	Capacity of containers (e.g., litres, pounds)	Type of container (barrel, tank, tidy-tank)	Proposed storage or staging location(s)
Diesel:		Refer to section 5.3 of the Exploration Work Plan and the Spill Contingency Plan.		
Gasoline:				
Aviation Fuel:				
Propane:				
Other: (describe)				

14. METHODS OF FUEL TRANSFER

Please describe the proposed methods to transfer fuel.

Refer to section 5.2.2 of the Exploration Work Plan and section 2.6 of the attached Spill Contingency Plan.

15. SPILL CONTINGENCY PLAN

Please include your Spill Contingency Plan in the Application Package, if applicable, or for small-scale projects, provide relevant details in the grey field provided below. An example of a Plan can be found in the INAC [Guidelines for Spill Contingency Planning](#).

A Spill Contingency Plan is attached to the application package.

16. PROPOSED TIME SCHEDULE

Indicate the proposed project start and completion dates and the time of year the project activities are planned to occur. Describe any anticipated temporary closure(s) or seasonal shutdowns. Refer to subsections 26(5) and (6) of the [Mackenzie Valley Land Use Regulations](#); indicate the term requested.

Start Date:	Dec 2019	Completion Date:	Dec 2026
Refer to section 5.10 of the attached Exploration Work Plan.			
Term of Permit Requested:	5 year, plus 2 year extension		

17. POTENTIAL ENVIRONMENTAL IMPACTS OF THE PROJECT AND PROPOSED MITIGATIONS

Please use the grey field below to provide or reference the following information:

Preliminary Screening: Describe all potential impacts and proposed mitigations. This information is used for the preliminary screening of potential impacts from the project and/or to develop conditions for the land use permit. Please indicate whether any of the mitigation measures have been developed as a result of input from affected parties. Additional guidance is provided in [Appendix B of the MVLWB Guide to the Land Use Permitting Process](#), the [Mackenzie Valley Review Board Environmental Impact Assessment Guidelines](#), and the [Mackenzie Valley Review Board Socio-Economic Impact Guidelines](#). Alternatively, if you are seeking an exemption from preliminary screening, provide supporting rationale.

A preliminary screening was completed by MVLWB on Dec 28, 2012 for land use permit MV2012C0025. Seabridge proposes that this land use permit renewal application should be exempt from further screening since the application is a renewal of an existing permit with no change in scope or activities.

Refer to Section 7 and 8 of the attached Exploration Work Plan for a discussion of environmental conditions and potential effects from proposed exploration activities.

A Wildlife Management and Monitoring Plan is attached.

Wildlife Management and Monitoring Plan: Applicants are encouraged to contact the Wildlife Division of the Government of the Northwest Territories – Environment and Natural Resources, prior to applying, to determine whether a Wildlife Management and Monitoring Plan may be needed.

18. CLOSURE AND RECLAMATION

Please use the grey field below to provide or reference the following information:

Closure and Reclamation Plan: Describe your plans for closure and reclamation, including any temporary closure(s) and seasonal shutdowns. Include your Closure and Reclamation Plan in your Application

Package, if applicable, or for small-scale projects, describe the proposed activities in the grey field provided below. Please also refer to the MVLWB/AANDC [Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories](#).

Closure Cost Estimate: Prepare a [Closure Cost Estimate](#) and include it in your Application Package. Applicants are encouraged to contact the Board, prior to applying, to determine which closure-cost-estimate template is most suited to the activities being applied for. Guidance is provided in section 2.2 of the MVLWB/INAC/GNWT [Guidelines for Closure and Reclamation Cost Estimates for Mines](#). If your Application is submitted concurrently with a Water Licence Application, please ensure water- and land-related activities and liabilities are provided.

A Closure and Reclamation Plan is attached which contains two closure cost estimates for the two-stage security that is proposed by Seabridge.

19. ADDITIONAL SUPPORTING INFORMATION

Please use the grey field below to provide or reference the following information:

Engagement: Conduct engagement, prepare an Engagement Record and Engagement Plan in accordance with the MVLWB [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#), and include them in your Application Package. Templates are provided in the Guidelines. Please also refer to [Information for Proponents on MVLWB's Engagement Requirements](#).

Land Use Planning: Please contact the applicable Land Use Planning Board or Tłı̄ch̄ Government to discuss conformity with the relevant land use plan(s). Attach your Land Use Plan Conformity Table that demonstrates how the project meets the requirements of the Land Use Plan, if applicable.

Traditional (Environmental) Knowledge (TEK/TK): Provision of TEK/TK is mandatory for applications to the Sahtu Land and Water Board. Other applicants are strongly encouraged to include TEK/TK.

Studies Undertaken to Date: Please list any relevant studies that support the proposed activities and include them in your Application Package.

Engagement - A summary of pre-submission engagement activities is included in section 10 of the Work Plan. Detailed engagement records are in Appendix H of the Work Plan.

An Engagement Plan is attached.

Land Use Planning – refer to section 2.5 of the Exploration Work Plan

Traditional Knowledge - refer to section 7.6 of the Exploration Work Plan.

Studies undertaken to date – refer to Appendix C of the Exploration Work Plan

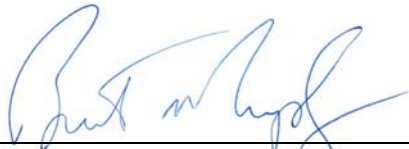
20. FEES

Please refer to section 20 of the [Mackenzie Valley Land Use Regulations](#).

Type of Fee	Amount (\$)
Application fee: <i>Includes 2 ha</i>	\$ 150.00
Land-use fees (for federal areas only): <i>6.3 ha</i>	\$ 310.00
Total Fees:	\$ 460.00

21. SIGNATURE

R. Brent Murphy Seabridge Gold (NWT) Inc.	VP Environmental Affairs
Applicant's Name (print) or Company Name	Position (print)

	Sept 18, 2019
Signature	Date

Please submit completed applications to the Regulatory Manager or Executive Director at the respective Land and Water Board (www.mvlwb.com, www.wlwb.ca, www.slwb.com, www.glwb.com).